



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: Simcala Inc.

FACILITY NAME: Simcala Inc.

FACILITY/PERMIT NO.: 209-0026

LOCATION: Mt. Meigs, Alabama

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, <u>Ala. Code</u> 1975, §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, <u>Ala. Code</u> 1975, §§22-22A-1 to 22-22A-15, (2006 Rplc. Vol. and 2007 Cum. Supp.) and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Issuance Date: Draft

Expiration Date: August 22, 2015

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Fede	erally E	nforceable Provisos	Regulations
1.	Trans	sfer	
	or oth	permit is not transferable, whether by operation of law herwise, either from one location to another, from one of equipment to another, or from one person to her, except as provided in Rule 335-3-1613(1)(a)5.	Rule 335-3-1602(6)
2.	Rene	<u>wals</u>	
	six (6	oplication for permit renewal shall be submitted at least 5) months, but not more than eighteen (18) months, e the date of expiration of this permit.	Rule 335-3-1612(2)
	to ope	ource for which this permit is issued shall lose its right erate upon the expiration of this permit unless a timely complete renewal application has been submitted in the time constraints listed in the previous paragraph.	
3.	Seve	rability Clause	
	and in claus invalicity invalicity confirms subpartity in the confirms in the	provisions of this permit are declared to be severable if any section, paragraph, subparagraph, subdivision, e, or phrase of this permit shall be adjudged to be add or unconstitutional by any court of competent diction, the judgment shall not affect, impair, or date the remainder of this permit, but shall be need in its operation to the section, paragraph, aragraph, subdivisions, clause, or phrase of this permit shall be directly involved in the controversy in which judgment shall have been rendered.	Rule 335-3-1605(e)
4.	Com	<u>pliance</u>	
	(a)	The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	Rule 335-3-1605(f)
	(b)	The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	Rule 335-3-1605(g)

<u>Termination for Cause</u>	
This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	Rule 335-3-1605(h)
Property Rights	
The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	Rule 335-3-1605(i)
Submission of Information	
The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	Rule 335-3-1605(j)
Economic Incentives, Marketable Permits, and Emissions Trading	
No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	Rule 335-3-1605(k)
Certification of Truth, Accuracy, and Completeness:	
Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.	Rule 335-3-1607(a)
	This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition. Property Rights The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege. Submission of Information The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit. Economic Incentives, Marketable Permits, and Emissions Trading No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. Certification of Truth, Accuracy, and Completeness: Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the

Fede	rally E	Enforceable Provisos	Regulations
10.	Insp	ection and Entry	
	may repre	n presentation of credentials and other documents as be required by law, the permittee shall allow authorized esentatives of the Alabama Department of ronmental Management and EPA to conduct the wing:	Rule 335-3-1607(b)
	(a)	Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;	
	(b)	Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;	
	(c)	Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;	
	(d)	Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.	
11.	Com	pliance Provisions	
	(a)	The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	Rule 335-3-1607(c)
	(b)	The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.	
12.	Com	pliance Certification	
		mpliance certification shall be submitted annually by ber $21^{\rm st}$ of each year.	Rule 335-3-1607(e)
	(a)	The compliance certification shall include the following:	
		(1) The identification of each term or condition of this permit that is the basis of the certification;	
		(2) The compliance status;	
			į.

Fede	rally E	Regulations	
		(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-1605(c) (Monitoring and Recording Keeping Requirements);	
		(4) Whether the method(s) or other means used to assure compliance provided continuous or intermittent data;	
		(5) Such other facts as the Department may require to determine the compliance status of the source;	
	(b)	The compliance certification shall be submitted to :	
	Alaba	ama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to: Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303	
13.	Reop	ening for Cause	
		r any of the following circumstances, this permit will be ned prior to the expiration of the permit:	Rule 335-3-1613(5)
	(a)	Additional applicable requirements under the Clear Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.	

	Regulations	forceable Provisos	rally En	Fede:	
		Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.			
		The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.	(c)		
		The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.	(d)		
		onal Rules and Regulations	<u>Additi</u>	14.	
	§22-28-16(d), <u>Co</u> <u>Alabama 1975</u> , a amended	ermit is issued on the basis of Rules and Regulations g on the date of issuance. In the event additional and Regulations are adopted, it shall be the permit s responsibility to comply with such rules.	existin Rules		
		Equipment Maintenance or Breakdown			
07(1),(2	Rule 335-3-107	In case of shutdown of air pollution control equipment for scheduled maintenance, the intent to shut down shall be reported to the Department at least 24 hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.			
		(1) Identification of the specific facility to be taken out of service as well as its location and permit number;			
		(2) The expected length of time that the air pollution control equipment will be out of service;			
		(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;			
		contaminants likely to occur during the			

Feder	rally E	nforce	eable Provisos	Regulations
		(4)	Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;	
		(5)	The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.	
	(b)	or up is exconta stand shall work pertinate the b	e event that there is a breakdown of equipment oset of process in such a manner as to cause, or spected to cause, increased emissions of air aminants which are above an applicable dard, the person responsible for such equipment notify the Director within 24 hours or the next ing day and provide a statement giving all nent facts, including the estimated duration of breakdown. The Director will be notified when the kdown has been corrected.	
16.	Oper	ation (of Capture and Control Devices	
	which operations the a as to	n this ated at sions o bove e	ution control devices and capture systems for permit is issued shall be maintained and all times in a manner so as to minimize the fair contaminants. Procedures for ensuring that quipment is properly operated and maintained so nize the emission of air contaminants shall be	§22-28-16(d), Code of Alabama 1975, as amended
17.	<u>Obno</u>	xious	<u>Odors</u>	
	obnorodoro the	xious ed by ous em Alaban these	t is issued with the condition that, should odors arising from the plant operations be Air Division inspectors, measures to abate the dissions shall be taken upon a determination by an Department of Environmental Management measures are technically and economically	Rule 335-3-108
	<u>Fugit</u>	tive Du	<u>ust</u>	
18.				
18.	(a)	emar	autions shall be taken to prevent fugitive dust nating from plant roads, grounds, stockpiles, ens, dryers, hoppers, ductwork, etc.	Rule 335-3-402

eder	ally E	Enforceable Provisos		Regulations	
		(1)	By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;		
		(2)	By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;		
		(3)	By paving;		
		(4)	By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions; or		
		(5)	By any combination of the above methods which results in the prevention of dust becoming airborne from the road surface.		
9.	<u>Addi</u>	tions	and Revisions		
	-		cations to this source shall comply with the n procedures in Rules 335-3-1613 or 335-3-16-	Rule 335-3-1613 and .14	
ю.	Reco	rdkee	ping Requirements		
	(a)		rds of required monitoring information of the ce shall include the following:	Rule 335-3-1605(c)(2)	
		(1)	The date, place, and time of all sampling or measurements;		
		(2)	The date analyses were performed;		
		(3)	The company or entity that performed the analyses;		
		(4)	The analytical techniques or methods used;		
		(5)	The results of all analyses; and		
		(3)	· ,		

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	(b)	Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.	
21.	Repo	orting Requirements	
	(a)	Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-1604(9).	Rule 335-3-1605(c)(3)
	(b)	Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	
22.	<u>Emis</u>	ssion Testing Requirements	
	provi safet accor 40 of	point of emission which requires testing will be ded with sampling ports, ladders, platforms, and other y equipment to facilitate testing performed in rdance with procedures established by Part 60 of Title f the Code of Federal Regulations, as the same may be nded or revised.	Rule 335-3-105(3) and Rule 335-3-1- .04(1)
	in a subn	Air Division must be notified in writing at least 10 days dvance of all emission tests to be conducted and nitted as proof of compliance with the Department's air tion control rules and regulations.	
	proce	avoid problems concerning testing methods and edures, the following shall be included with the ication letter:	

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	(1)	The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.	Rule 335-3-104
	(2)	A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures requires probe cleaning).	
	(3)	A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.	
	(4)	A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.	
	owne and	etest meeting may be held at the request of the source er or the Air Division. The necessity for such a meeting the required attendees will be determined on a case-by- basis.	Rule 335-3-104
	30 d	est reports must be submitted to the Air Division within lays of the actual completion of the test unless an asion of time is specifically approved by the Air Division.	
23.	Payr	nent of Emission Fees	
		ual emission fees shall be remitted each year according e fee schedule in ADEM Admin. Code R. 335-1-704.	Rule 335-1-704
24.	Othe	er Reporting and Testing Requirements	
	fuel may pollu	mission of other reports regarding monitoring records, analyses, operating rates, and equipment malfunctions be required as authorized in the Department's air ation control rules and regulations. The Department require emission testing at any time.	Rule 335-3-104(1)

Fede	rally I	Enforc	eable Provisos	Regulations
25.	Title	VI R	equirements (Refrigerants)	
	inclu Class 82, 3 and prac- certif	iding as II ozo Subpa main tices fied re	y having appliances or refrigeration equipment, air conditioning equipment, which use Class I or one-depleting substances as listed in 40 CFR Part rt A, Appendices A and B, shall service, repair, tain such equipment according to the work , personnel certification requirements, and ecycling and recovery equipment specified in 40 t2, Subpart F.	40 CFR Part 82
	Class the r	s I or epair,	shall knowingly vent or otherwise release any Class II substance into the environment during servicing, maintenance, or disposal of any device provided in 40 CFR Part 82, Subpart F.	
	recor	dkeep be su	nsible official shall comply with all reporting and sing requirements of 40 CFR 82.166. Reports abmitted to the US EPA and the Department as	
26.	Chei	mical .	Accidental Prevention Provisions	
	prese	ent in	cal listed in Table 1 of 40 CFR Part 68.130 is a process in quantities greater than the threshold sted in Table 1, then:	40 CFR Part 68
	(a)		owner or operator shall comply with the visions in 40 CFR Part 68.	
	(b)		owner or operator shall submit one of the wing:	
		(1)	A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,	
		(2)	A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	
27.	Disp	lay of	Permit	
	at th locat	e site ed ar	t shall be kept under file or on display at all times where the facility for which the permit is issued is and will make the permit readily available for by any or all persons who may request to see it.	Rule 335-3-1401(1)(d

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28.	Circumvention	
	No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.	Rule 335-3-110
29.	Visible Emissions	
	Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.	Rule 335-3-401(1)
30.	Fuel-Burning Equipment	
	(a) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-403.	Rule 335-3-403
	(b) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-501.	Rule 335-3-501
31.	Process Industries - General	
	Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-404.	Rule 335-3-404
32.	Averaging Time for Emission Limits	Rule 335-3-105
	Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.	

ally	Regulations	
Con	npliance Assurance Monitoring (CAM)	
app requ emi	ditions (a) through (d) that follow are general conditions licable to emissions units that are subject to the CAM airements. Specific requirements related to each ssions unit are contained in the unit specific provisos the attached CAM appendices.	
(a)	Operation of Approved Monitoring	40 CFR 64.7
(1)	Commencement of operation. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).	
(2)	Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.	
(3)	Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.	

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- (4)Response to excursions or exceedances. (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutantspecific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary followup actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
 - (a) Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

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(b) (Quality Improvement Plan (QIP) Requirements	40 CFR 64.8
(1)	Based on the results of a determination made under Section 33(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.	
(2)	Elements of a QIP:	
and have 2. The plate control evaluate plan to	ner or operator shall maintain a written QIP, if required, we it available for inspection. In initially shall include procedures for evaluating the performance problems and, based on the results of the ion procedures, the owner or operator shall modify the include procedures for conducting one or more of the ag actions, as appropriate:	
	(i) Improved preventive maintenance practices.	
	(ii) Process operation changes.	
	(iii) Appropriate improvements to control methods.	
	(iv) Other steps appropriate to correct control performance.	
(3)	 (v) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above). If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined. 	

implement the QIP was determined.

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4)	Following implementation of a QIP, upon any subsequent determination pursuant to Section 33(a)(4)(b) above, the Department may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:	
	(a) Failed to address the cause of the control device performance problems; or(b) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.	
(5)	Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.	
(c)]	Reporting and Recordkeeping Requirements	40 CFR 64.9
(1)	General reporting requirements	
	On and after the date specified in Section 33(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code R. 335-3-1605(c)3.	
	A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code R. 335-3-1605(c)3. and the following information, as applicable: (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents	

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	(iii) A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. I recordkeeping requirements.	
(b)	The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code R. 335-3-1605(c)2 The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	

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(d) Savings Provisions	40 CFR 64.10
(1) Nothing in this part shall:	
(a) Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.	
 (b)Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable. (c)Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act. 	

Summary Page for 20 MW Electric Arc Furnace No. 1 & associated Tapping Operation w/ Multiclone & Baghouse #1

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP001	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #1 (Baghouse #1 is EP001)	PM	The Greater of 0.99 lb/MW or Process Weight (see general proviso 31 for process weight)	Rule 335-3-404 40 CFR 60.262(a)(1)
EP001	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #1 (Baghouse #1 is EP001)	СО	N/A	N/A
EP001	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #1 (Baghouse #1 is EP001)	NOx	N/A	N/A
EP001	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #1 (Baghouse #1 is EP001)	SO ₂	N/A	N/A
EP001	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #1 (Baghouse #1 is EP001)	VOC	N/A	N/A
EP001	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #1 (Baghouse #1 is EP001)	HAPs	N/A	N/A
EP001	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #1 (Baghouse #1 is EP001)	Opacity	(see general proviso 29)	Rule 335-3-401

Provisos for 20 MW Electric Arc Furnace No. 1 & associated Tapping Operation w/ Multiclone Baghouse #1

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits."	Rule 335-3-1603
2. This unit is subject to the emission standard in §60.262(a)(1).	40 CFR 60.262(a)(1)
	Rule 335-3-1001(2)
3. For particulate matter emissions, this source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso No. 33.	40 CFR Part 64 CAM
Emission Standards	
Particulate matter emissions from this unit shall not exceed the greater of 0.99 lb per Megawatt-hr or the allowable as set by Rule 335-3-404.	Rule 335-3-1001(2)
	40 CFR 60.262(a)(1)
	Rule 335-3-404
Compliance and Performance Test Methods and Procedures	
1. Method 5D of 40 CFR (Latest Edition) Part 60, Appendix A, or an equilivent method as approved by the Department shall be used in the determination of particulate matter emissions.	Rule 335-3-104
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity.	Rule 335-3-104
Emission Monitoring	
 Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring". 	40 CFR Part 64 CAM
2. The facility shall perform a daily inspection of the furnace building to verify proper operation of the furnace baghouse.	Rule 335-3-1605(c)
The following activities shall be performed:	
(a) Once per day check the furnace and tap hoods for fugitive emissions.	
(b) Record any repairs or observed problems.	

Fe	derally Enforceable Provisos	Regulations
3.	The facility shall perform a weekly inspection of the furnace baghouse to verify proper operation.	Rule 335-3-1605(c)
	The following activities shall be performed:	
	(a) The baghouse shall be inspected weekly for damaged bags, air leaks, water infiltration, caking or blinding of bags, proper cleaning function and cycling. Maintenance shall be performed as needed.	
	(b) Once per week a visual check of all hoods and ductwork.	
	(c) Record any repairs or observed problems.	
4.	The facility shall perform the following annual inspections of the main baghouse to verify proper operation.	Rule 335-3-1605(c)
	The following activities shall be performed:	
	(a) Internal inspection of structure, access doors and bags.	
	(b) Internal inspection of all hoppers.	
	(c) Record any repairs or observed problems.	
Re	cordkeeping and Reporting Requirements	
1	The facility shall maintain a record of all inspections, to include visible observations, performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-1605(c)
2	The facility shall maintain a record of all weekly and annual baghouse inspections to satisfy the requirements of periodic monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-1605(c)
3	The facility shall maintain a record of all differential pressure readings performed to satisfy the requirements of Compliance Assurance Monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	40 CFR Part 64 CAM
4	The facility shall maintain a record of all fan amperage readings for the baghouse performed to satisfy the requirements of Compliance Assurance Monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	40 CFR Part 64 CAM

Summary Page for 20 MW Electric Arc Furnace No. 2 & associated Tapping Operation w/ Multiclone & Baghouse #2

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP002	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #2 (Baghouse #2 is EP002)	PM	The Greater of 0.99 lb/MW or Process Weight (see general provisos for process weight)	Rule 335-3-404 §60.262(a)(1)
EP002	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #2 (Baghouse #2 is EP002)	СО	N/A	N/A
EP002	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #2 (Baghouse #2 is EP002)	NOx	N/A	N/A
EP002	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #2 (Baghouse #2 is EP002)	SO ₂	N/A	N/A
EP002	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #2 (Baghouse #2 is EP002)	VOC	N/A	N/A
EP002	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #2 (Baghouse #2 is EP002)	HAPs	N/A	N/A
EP002	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #2 (Baghouse #2 is EP002)	Opacity	(see general provisos)	Rule 335-3-401

Provisos for 20 MW Electric Arc Furnace No. 2 & associated Tapping Operation w/ Multiclone Baghouse #2

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits."	Rule 335-3-1603
2. This unit is subject to the emission standard in §60.262(a)(1).	40 CFR 60.262(a)(1)
	Rule 335-3-1001(2)
3. For particulate matter emissions, this source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso No. 33.	40 CFR Part 64 CAM
Emission Standards	
1. Particulate matter emissions from this unit shall not exceed the	Rule 335-3-1001(2)
greater of 0.99 lb per Megawatt-hr or the allowable as set by Rule 335-3-404.	40 CFR 60.262(a)(1)
	Rule 335-3-404
Compliance and Performance Test Methods and Procedures	
1. Method 5D of 40 CFR (Latest Edition) Part 60, Appendix A, or an equilivent method as approved by the Department shall be used in the determination of particulate matter emissions.	Rule 335-3-104
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity.	Rule 335-3-104
Emission Monitoring	
1. Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR Part 64 CAM
2. The facility shall perform a daily inspection of the furnace building to verify proper operation of the furnace baghouse.	Rule 335-3-1605(c)
The following activities shall be performed:	
(a) Once per day check the furnace and tap hoods for fugitive emissions.	
(b) Record any repairs or observed problems.	

Fe	derally Enforceable Provisos	Regulations
3.	The facility shall perform a weekly inspection of the furnace baghouse to verify proper operation.	Rule 335-3-1605(c)
	The following activities shall be performed:	
	(a) The baghouse shall be inspected weekly for damaged bags, air leaks, water infiltration, caking or blinding of bags, proper cleaning function and cycling. Maintenance shall be performed as needed.	
	(b) Once per week a visual check of all hoods and ductwork.	
	(c) Record any repairs or observed problems.	
4.	The facility shall perform the following annual inspections of the main baghouse to verify proper operation.	Rule 335-3-1605(c)
	The following activities shall be performed:	
	(a) Internal inspection of structure, access doors and bags.	
	(b) Internal inspection of all hoppers.	
	(c) Record any repairs or observed problems.	
Re	cordkeeping and Reporting Requirements	
1.	The facility shall maintain a record of all inspections, to include visible observations, performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-1605(c)
2.	The facility shall maintain a record of all weekly and annual baghouse inspections to satisfy the requirements of periodic monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-1605(c)
3.	The facility shall maintain a record of all differential pressure readings performed to satisfy the requirements of Compliance Assurance Monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	40 CFR Part 64 CAM
4.	The facility shall maintain a record of all fan amperage readings for the baghouse performed to satisfy the requirements of Compliance Assurance Monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	40 CFR Part 64 CAM

Summary Page for 20 MW Electric Arc Furnace No. 3 & associated Tapping operation w/ Multiclone & Baghouse #3

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP003	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #3 (Baghouse #3 is EP003)	PM	The Greater of 0.99 lb/MW or Process Weight (see general provisos for process weight)	Rule 335-3-404 §60.262(a)(1)
EP003	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #3 (Baghouse #3 is EP003)	СО	N/A	N/A
EP003	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #3 (Baghouse #3 is EP003)	NOx	N/A	N/A
EP003	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #3 (Baghouse #3 is EP003)	SO ₂	N/A	N/A
EP003	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #3 (Baghouse #3 is EP003)	VOC	N/A	N/A
EP003	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #3 (Baghouse #3 is EP003)	HAPs	N/A	N/A
EP003	20 MW Electric Arc Furnace and Associated Tapping Operation with Multiclone & Baghouse #3 (Baghouse #3 is EP003)	Opacity	(see general provisos)	Rule 335-3-401

Provisos for 20 MW Electric Arc Furnace No. 3 & associated Tapping Operation w/ Multiclone Baghouse #3

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits."	Rule 335-3-1603
2. This unit is subject to the emission standard in §60.262(a)(1).	40 CFR 60.262(a)(1)
	Rule 335-3-1001(2)
3. For particulate matter emissions, this source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso No. 33.	40 CFR Part 64 CAM
Emission Standards	
1. Particulate matter emissions from this unit shall not exceed the	Rule 335-3-1001(2)
greater of 0.99 lb per Megawatt-hr or the allowable as set by Rule 335-3-404.	40 CFR 60.262(a)(1)
	Rule 335-3-404
Compliance and Performance Test Methods and Procedures	
1. Method 5D of 40 CFR (Latest Edition) Part 60, Appendix A, or an equilivent method as approved by the Department shall be used in the determination of particulate matter emissions.	Rule 335-3-104
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity.	Rule 335-3-104
Emission Monitoring	
 Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring". 	40 CFR Part 64 CAM
2. The facility shall perform a daily inspection of the furnace building to verify proper operation of the furnace baghouse.	Rule 335-3-1605(c)
The following activities shall be performed:	
(a) Once per day check the furnace and tap hoods for fugitive emissions.	
(b) Record any repairs or observed problems.	

Fe	derally Enforceable Provisos	Regulations
3.	The facility shall perform a weekly inspection of the furnace baghouse to verify proper operation.	Rule 335-3-1605(c)
	The following activities shall be performed:	
	(a) The baghouse shall be inspected weekly for damaged bags, air leaks, water infiltration, caking or blinding of bags, proper cleaning function and cycling. Maintenance shall be performed as needed.	
	(b) Once per week a visual check of all hoods and ductwork.	
	(c) Record any repairs or observed problems.	
4.	The facility shall perform the following annual inspections of the main baghouse to verify proper operation.	Rule 335-3-1605(c)
	The following activities shall be performed:	
	(a) Internal inspection of structure, access doors and bags.	
	(b) Internal inspection of all hoppers.	
	(c) Record any repairs or observed problems.	
Re	cordkeeping and Reporting Requirements	
1.	The facility shall maintain a record of all inspections, to include visible observations, performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-1605(c)
2.	The facility shall maintain a record of all weekly and annual baghouse inspections to satisfy the requirements of periodic monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-1605(c)
3.	The facility shall maintain a record of all differential pressure readings performed to satisfy the requirements of Compliance Assurance Monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	40 CFR Part 64 CAM
4.	The facility shall maintain a record of all fan amperage readings for the baghouse performed to satisfy the requirements of Compliance Assurance Monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	40 CFR Part 64 CAM

Summary Page for Product Crushing, Screening, and Processing w/ Baghouse 4, 5, and 6

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP004	Chemical Crusher	PM	Process Weight (see general proviso 31)	Rule 335-3-404
EP004	Chemical Crusher	Opacity	(see general proviso 29)	Rule 335-3-401
EP005	Roll Crusher	PM	Process Weight (see general proviso 31)	Rule 335-3-404
EP005	Roll Crusher	Opacity	(see general proviso 29)	Rule 335-3-401
EP006	Aluminum Crusher	PM	Process Weight (see general proviso 31)	Rule 335-3-404
EP006	Aluminum Crusher	Opacity	(see general proviso 29)	Rule 335-3-401

Provisos for Product Crushing, Screening, and Processing w/ Baghouse 4, 5, and 6

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits."	Rule 335-3-1603
Emission Standards	
1. This Source is subject to no additional specific requirements other than those listed in the General Permit Provisos.	N/A
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of particulate matter emissions or an alternative method as approved by the Department.	Rule 335-3-104
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity.	Rule 335-3-104
Emission Monitoring	
1. The facility shall perform a visual check, once per week, of the baghouse stacks associated with these units. This check shall be performed by a person familiar with Method 9. If visible emissions in excess of 10% opacity are noted, and are not corrected within a period of 1 hour, then a Method 9 must be performed within 4 hours of the observations. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-1605
2. The facility shall perform a weekly inspection of the baghouses associated with this unit to verify proper operation.	Rule 335-3-1605
The following activities shall be performed:	
(a) Once per week check the capture hoods associated with this permit for fugitive emissions.	
(b) Once per month check hopper, fan and cleaning cycle for proper operation.	
(c) Once per month a visual check of all hoods and ductwork.	
Record any repairs or observed problems.	

Federally Enforceable Provisos	Regulations
3. The facility shall perform the following annual inspections of the main baghouse to verify proper operation.	Rule 335-3-1605
The following activities shall be performed:	
(a) Internal inspection of structure, access doors and bags.	
(b) Internal inspection of all hoppers.	
Recordkeeping and Reporting Requirements	
1. The facility shall maintain a record of all inspections, to include visible observations and Method 9's, performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-1605
2. The facility shall report any Method 9's with an average opacity over 20%. Such reports shall be made within 48 hrs of such observations.	Rule 335-3-1605
3. The facility shall maintain a record of all weekly and annual baghouse inspections to satisfy the requirements of periodic monitoring. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-1605

Summary Page for Product Handling

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
F008	Fugitives from the Storage Bin Loading, Microsilica Bagging, and Rail Car Loading	PM	(see general provisos)	335-3-404

Provisos for Product Handling

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits."	Rule 335-3-1603
Emission Standards	
1. These Sources are subject to no additional specific requirements other than those listed in the General Permit Provisos.	N/A
Compliance and Performance Test Methods and Procedures	
1. These Sources are subject to no additional specific requirements other than those listed in the General Permit Provisos.	N/A
Emission Monitoring	
1. These Sources are subject to no additional specific requirements other than those listed in the General Permit Provisos.	N/A
Recordkeeping and Reporting Requirements	
1. These Sources are subject to no additional specific requirements other than those listed in the General Permit Provisos.	N/A

APPENDIX CAM

Compliance Assurance Monitoring Requirements

CAM Plan for 20 MW EAF No. 1 and associated tapping operation with multicyclone and baghouse No. 1

	Indicator 1	Indicator 2	Indicator 3
I. Indicator	Visible Emissions	Differential Pressure	Baghouse Fan Amperage
Measurement Approach	Trained and qualified personnel will do a visible inspection.	Measured using a pressure gauge.	Measured using an ammeter.
II. Indicator Range	While the unit is operating, an excursion is defined as the presence of visible emissions greater than 10% opacity from the baghouse stack. Excursions trigger an inspection, corrective action, and a reporting requirement. If an excursion is noted and not corrected within a period of (1) one hour, then a method 9 must be performed within (4) four hours of the observation.	While the unit is operating, an excursion is defined as a pressure differential below 5.0 inches of H ₂ O or greater than 15.0 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.	While the unit is operating, an excursion is defined as a fan amperage that is below 100 amps. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria			
1. Data Representativenes	Measurement is being made at the emission point (baghouse exhaust).	The pressure differential is being measured between the inlet and outlet of the baghouse.	The fan amperage is being measured at the fan.
2. Verification of Operation Status	Not Applicable	Not Applicable	Not Applicable
3. QA/QC Practices and Criteria	Qualified personnel will perform the visible inspection.	The pressure gauge will be calibrated quarterly. Pressure taps checked daily.	The fans will be checked daily during the inspections. The ammeter will be zeroed when the unit is not operating.
4. Monitoring Frequency	The visible inspection will be performed daily.	The pressure drop will be monitored daily.	The fan amperage will be monitored daily.
5. Data Collection Procedures	The visible inspection will be recorded with the time, date, and name of the observer.	The pressure differential will be recorded with the time, date, and name of the observer.	The fan amperage will be recorded with the time, date, and name of the observer.
6. Averaging Period	Instantaneous	Instantaneous	Instantaneous

CAM Plan for 20 MW EAF No. 2 and associated tapping operation with multicyclone and baghouse No. 2

	Indicator 1	Indicator 2	Indicator 3
I. Indicator	Visible Emissions	Differential Pressure	Baghouse Fan Amperage
Measurement Approach	Trained and qualified personnel will do a visible inspection.	Measured using a pressure gauge.	Measured using an ammeter.
II. Indicator Range	While the unit is operating, an excursion is defined as the presence of visible emissions greater than 10% opacity from the baghouse stack. Excursions trigger an inspection, corrective action, and a reporting requirement. If an excursion is noted and not corrected within a period of (1) one hour, then a method 9 must be performed within (4) four hours of the observation.	While the unit is operating, an excursion is defined as a pressure differential below 5.0 inches of H ₂ O or greater than 15.0 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.	While the unit is operating, an excursion is defined as a fan amperage that is below 100 amps. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria			
1. Data Representativenes	Measurement is being made at the emission point (baghouse exhaust).	The pressure differential is being measured between the inlet and outlet of the baghouse.	The fan amperage is being measured at the fan.
2. Verification of Operation Status	Not Applicable	Not Applicable	Not Applicable
QA/QC Practices and Criteria	Qualified personnel will perform the visible inspection.	The pressure gauge will be calibrated quarterly. Pressure taps checked daily.	The fans will be checked daily during the inspections. The ammeter will be zeroed when the unit is not operating.
4. Monitoring Frequency	The visible inspection will be performed daily.	The pressure drop will be monitored daily.	The fan amperage will be monitored daily.
5. Data Collection Procedures	The visible inspection will be recorded with the time, date, and name of the observer.	The pressure differential will be recorded with the time, date, and name of the observer.	The fan amperage will be recorded with the time, date, and name of the observer.
6. Averaging Period	Instantaneous	Instantaneous	Instantaneous

CAM Plan for 20 MW EAF No. 3 and associated tapping operation with multicyclone and baghouse No. 3

	Indicator 1	Indicator 2	Indicator 3
I. Indicator	Visible Emissions	Differential Pressure	Baghouse Fan Amperage
Measurement Approach	Trained and qualified personnel will do a visible inspection.	Measured using a pressure gauge.	Measured using an ammeter.
II. Indicator Range	While the unit is operating, an excursion is defined as the presence of visible emissions greater than 10% opacity from the baghouse stack. Excursions trigger an inspection, corrective action, and a reporting requirement. If an excursion is noted and not corrected within a period of (1) one hour, then a method 9 must be performed within (4) four hours of the observation.	While the unit is operating, an excursion is defined as a pressure differential below 5.0 inches of H ₂ O or greater than 15.0 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.	While the unit is operating, an excursion is defined as a fan amperage that is below 100 amps. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria			
Data Representativenes	Measurement is being made at the emission point (baghouse exhaust).	The pressure differential is being measured between the inlet and outlet of the baghouse.	The fan amperage is being measured at the fan.
Verification of Operation Status	Not Applicable	Not Applicable	Not Applicable
QA/QC Practices and Criteria Monitoring Frequency	Qualified personnel will perform the visible inspection.	The pressure gauge will be calibrated quarterly. Pressure taps checked daily.	The fans will be checked daily during the inspections. The ammeter will be zeroed when the unit is not operating.
	The visible inspection will be performed daily.	The pressure drop will be monitored daily.	The fan amperage will be monitored daily.
Data Collection Procedures	The visible inspection will be recorded with the time, date, and name of the observer.	The pressure differential will be recorded with the time, date, and name of the observer.	The fan amperage will be recorded with the time, date, and name of the observer.
Averaging Period			
	Instantaneous	Instantaneous	Instantaneous